



Federal Regulatory Affairs

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October 5, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On October 3, 2011, Kathleen Q. Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs, Frontier Communications, spoke on the phone with Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski, to discuss the above-captioned proceedings.

Ms. Abernathy expressed Frontier's support for the America's Broadband Connectivity Plan ("ABC Plan") and Joint Framework filed in these dockets. Ms. Abernathy discussed the efficient role that the right-of-first refusal plays in the ABC Plan; adopting the right-of-first refusal allows the Commission to ensure that the resultant broadband deployment can be done in a rapid and targeted manner. The right-of-first refusal would not preclude competition as there would be many areas in which it would not apply. Further the mobility fund component of the ABC Plan allows for increased wireless deployment across rural areas. In addition, the parties discussed the time frame issues associated with adoption of the plan and the CenturyLink, Frontier, and Windstream prior proposal for an interim step that could be implemented in the context of a two-staged approach to reform.¹ Finally, the parties discussed the importance of revenue recovery mechanisms in concert with intercarrier compensation reform.

¹ See Letter from Robert W. Quinn, Jr., AT&T; Steve Davis, CenturyLink; Michael T. Skrivan, FairPoint; Kathleen Q. Abernathy, Frontier; Kathleen Grillo, Verizon; and Michael D. Rhoda, Windstream; to Marlene H. Dortch, FCC, CC Docket Nos. 01-92, 99-200, 96-98, 99-68, 96-45; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51 (filed July 29, 2011); Letter from Jennie B. Chandra, Windstream Communications, Inc., to Marlene H. Dortch, FCC, WC Docket No. 10-90 et al. (filed June 30, 2011).

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(203) 614-4702

cc: Zac Katz